



ORIGINAL

FILED
DISTRICT COURT OF GUAM

JUL 02 2021

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CLERK OF COURT

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7 IN THE UNITED STATES DISTRICT COURT
8
9 FOR THE TERRITORY OF GUAM

10 UNITED STATES OF AMERICA,

CRIMINAL CASE NO. 19-00031

11 Plaintiff,

12 vs.

13 THOMAS E. MARLER,
JAYANIKA LAWRENCE, and
JOHN HOBART "BART" LAWRENCE,

14 Defendants.

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UNITED STATES' APPLICATION
TO SEAL DOCUMENTS

21 COMES NOW, the United States of America, by and through the undersigned counsel,
22 and hereby moves this Honorable Court for leave to file Exhibit 1 of United States' Reply to
23 Defendants' Response to United States' Motion to Sever Defendant John Hobart "Bart"
24 Lawrence under seal. This request is made because the exhibit constitutes the statements of
defendant John Hobart "Bart" Lawrence which will likely be used as evidence if this matter
proceeds to trial. Therefore, the Government requests that this exhibit be sealed in the interest of
justice, to preserve the rights of the parties, and to ensure an impartial jury.

25 Respectfully submitted this 2nd day of July, 2021.

26 SHAWN N. ANDERSON
United States Attorney
Districts of Guam and NMI

27 By:

28 BENJAMIN K. PETERSBURG
Assistant U.S. Attorney